

Case Name: BlockCrushr Inc. v. ConsenSys Inc. et al
Docket #: 20-cv-3134

INITIAL CONFERENCE QUESTIONNAIRE

1. Have the parties exchanged the automatic disclosures required by Fed. R. Civ. P. 26(a)(1)?
Yes.
2. If additional interrogatories beyond the 25 permitted under Fed. R. Civ. P. 33(a) are needed, the maximum *additional* ones by: plaintiff(s) 0 and defendant(s) 0.

The parties further agree that interrogatories asking for the factual basis for denials of requests for admission will count as a single interrogatory.
3. Maximum number of requests for admission by: plaintiff(s) 100 and defendant(s) 100

The parties further agree that requests for admission regarding admissibility are excluded from these totals.
4. Number of depositions by plaintiff(s) of: The parties agree that Plaintiff will get 10 depositions total, regardless of whether they are party or non-party. Plaintiff reserves the right, for good cause shown, to seek additional depositions, if necessary.
5. Number of depositions by defendant(s) of: The parties agree that Defendants will get 10 depositions total, regardless of whether they are party or non-party. Defendants reserve the right, for good cause shown, to seek additional depositions, if necessary.
6. Time limit per deposition (if more than 7 hours permitted by Fed. R. Civ. P. 30 (d)(1) is required): The parties agree to limit depositions to 7 hours for fact witnesses and 8 hours for expert witnesses, except that if a witness is appearing as both a percipient witness and a 30(b)(6) witness the parties agree to limit the deposition to 8 hours.
7. Date for completion of factual discovery: Friday, May 28, 2021
8. Number of expert witnesses of plaintiff(s): medical: 0 non-medical: 2
Date for expert disclosure, including report(s):

Opening Expert Reports: Friday, July 2, 2021
Rebuttal Expert Reports: Friday, July 30, 2021

The parties further agree that the party with the burden of proof on the issue will submit the opening expert report.

9. Number of expert witnesses of defendant(s): medical: 0 non-medical: 2
Date for expert disclosure, including report(s):

Opening Expert Reports: Friday, July 2, 2021
Rebuttal Expert Reports: Friday, July 30, 2021

The parties further agree that the party with the burden of proof on the issue will submit the opening expert report.

10. Dates for completion of expert depositions (if desired): Friday, August 27, 2021

11. Time for amendment of the pleadings by plaintiff(s): N/A and by defendant(s): N/A

12. Number of proposed additional parties to be joined by plaintiff(s): N/A and defendant(s): N/A and time for adding those parties: N/A

13. Types of contemplated dispositive motions: The parties anticipate filing motions for summary judgment.

14. Dates for filing contemplated dispositive motions, or where applicable, requests for a premotion conference: On or before Friday, September 24, 2021 the parties will request a premotion conference regarding their anticipated summary judgment motions per the Court's rules.

15. Have counsel reached any agreements regarding electronic discovery? If so, please describe at the initial conference.
The parties have discussed preparing an Electronic Storage of Information (“ESI”) order and have agreed to work in good faith to negotiate and finalize the ESI order.

16. Do the parties consent to trial before a magistrate judge pursuant to 28 U.S.C. § 636(d)?
(Answer “no” if any party declines to consent, without indicating which party has declined.)
No.

Date: October 5, 2020

Respectfully submitted,

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